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LEXISNEXIS SCREENING SOLUTIONS INC.
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8 **UNITED STATES DISTRICT COURT**
9 **SOUTHERN DISTRICT OF CALIFORNIA**
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11 MONTY N. CAZIER, for himself and on behalf
of all similarly situated individuals,

12 Plaintiffs,
13

14 v.

15 LEXISNEXIS SCREENING SOLUTIONS, INC.,
formerly known as CHOICEPOINT'S
16 WORKPLACE SOLUTIONS, INC., a
corporation; and DOES 1 through 50, inclusive,

17 Defendants.
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Case No. 10 CV 1531 MMA JMA

CLASS ACTION

**STIPULATION AND JOINT
MOTION TO FURTHER
EXTEND TIME TO RESPOND
TO COMPLAINT**

Complaint Filed: July 22, 2010

Pursuant to Southern District Local Civil Rules 7.2 and 12.1, plaintiff Monty N. Cazier and defendant LexisNexis Screening Solutions Inc., through their respective attorneys, hereby stipulate, agree and jointly move the Court for an order providing that the time by which defendant may answer or otherwise respond to the complaint be extended to and include November 10, 2010. This is the parties' second request for an extension of defendant's response deadline. (Docket No. 4.) On September 24, 2010, the Court approved the parties' first request and ordered that defendant respond to the complaint by October 11, 2010. (Docket No. 6.)

Good cause supports the parties' further stipulation and joint motion. Plaintiff in this putative Fair Credit Reporting Act ("FCRA") class action concurrently filed in this District another putative class action, *Cazier v. HD Supply, Inc.*, No. 10-1530 LAB NLS, asserting FCRA claims arising out of the same employment application process as is implicated here. Plaintiff is represented in each of the two cases by the same counsel; the defendants in the two cases are represented by the same counsel. The parties have engaged in substantive negotiations regarding an early disposition of both matters and submit that a further limited extension of time would work to preserve the parties' resources as well as the time and resources of the Court. Plaintiff and defendants in both matters agree that defendants' time to answer or otherwise respond to the respective complaints should be extended to November 10, 2010, so that initial scheduling issues remain coordinated.

For the foregoing reasons, the parties respectfully request that the time for defendant to answer or otherwise respond to the complaint be extended to and include November 10, 2010.

Dated: October 5, 2010

MORRISON & FOERSTER LLP

By: s/ James F. McCabe

James F. McCabe

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Attorneys for Defendant
LEXISNEXIS SCREENING
SOLUTIONS, INC.

1 Dated: October 5, 2010

MCCOY, TURNAGE & ROBERTSON, LLP

2
3 By: s/ James R. Robertson

4 James R. Robertson

5 Email: jrr@mtrlaw.com

6 Attorneys for Plaintiff

7 MONTY N. CAZIER

CERTIFICATE OF SERVICE

I certify that on this 5th day of October 2010, I electronically filed the foregoing Stipulation and Joint Motion to Further Extend Time to Respond to Complaint with the Clerk of the Court using the CM/ECF System, which will send a notification of the filing to the following attorneys of record:

James R. Robertson, Esq.
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5469 Kearny Villa Road, Suite 206
San Diego, California 92123

Attorneys for Plaintiff Monty N. Cazier

s/ James F. McCabe
James F. McCabe